07/07/2008 16:45

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Ms. Erinn D. Larkin
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign PAC (April 2008 Monthly Report)

Identification Number: C00235853

Dear Ms. Larkin:

This letter responds to your request for additional information dated June 4, 2008 regarding HRC PAC s April 2008 Monthly Report.

1. You asked for a description of HRC PAC s procedures for requesting the identification of information for individuals who contribute in excess of \$200 in a calendar year. As described in previous correspondence, HRC PAC has established procedures consistent with the FEC s best efforts regulations.

In response to a previous letter, HRC PAC initiated a further review of its procedures in order to regularly obtain updated contributor information from recurring contributors, i.e. contributors who make monthly, quarterly or annual contributions to HRC PAC.

On May 27, 2008, HRC PAC mailed out best efforts letters to all recurring PAC contributors (more than 500 individuals) requesting updated contributor information. These letters were sent both to recurring contributors for whom the PAC does not have any employer and occupation information as well as recurring contributors for whom this information may be outdated. In addition, HRC PAC has mailed best efforts letters to one-time PAC contributors who have contributed in calendar years 2007 and 2008. HRC PAC is in the process of updating information from these contributors and will amend reports or update future reports as appropriate.

- 2. The April 2008 Monthly Report inadvertently designated to the primary election a contribution of \$4,975 made to Nancy Pelosi for Congress on March 20, 2008. This disbursement should have been reported on Schedule B as a general election contribution. HRC PAC made the contribution for the general election cycle and therefore did not exceed contribution limits. We regret the administrative error and have amended the report to reflect the correct election designation.
- 3. The April 2008 Monthly Report inadvertently designated to the primary election contributions of \$1,000 made to Davis for Congress, Jesse Jackson, Jr. for Congress, and Van Hollen for Congress on March 6, 2008. These disbursements should have been reported on Schedule B as general election contributions. HRC PAC made the contributions for the general election cycle and therefore did not make the contributions for a past election or for debt retirement. We regret the administrative error and have amended the report to reflect the correct election designation.

Pursuant to your telephone conversation with HRC staff counsel Darrin Hurwitz on June 26, 2008, I hope this additional information answers your specific requests. Should you need further information or seek additional details regarding our best efforts procedures, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz at (202) 572-8914.

Sincerely,

Jim Rinefierd Treasurer

